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May 27, 2021

VIA ECF

The Honorable Barbara C. Moses United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312 USDC SDNY
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MEMO ENDORSED

Re: Williams v. Bluestone Perennials, Inc.: Case No. 1:21-cv-00855-PGG-BCM

Dear Judge Moses:

We represent defendant Bluestone Perennials, Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, Milton Williams, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from May 27, 2021 to July 12, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Timothy J. Straub
Timothy J. Straub

Application GRANTED. All case deadlines are hereby stayed until **July 12, 2021**. As this is, effectively, the fourth extension of defendant's time to answer or otherwise respond to the complaint, no further extensions will be granted. SO ORDERED.

Barbara Moses

United States Magistrate Judge

May 28, 2021

cc:

All counsel of record (by ECF)